

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,  
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF  
DEFENDANTS' MOTION IN LIMINE TO EXCLUDE  
EVIDENCE OF ALLEGED "ACTUAL CONFUSION"**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of Plaintiff's Sixth Supplemental Objections and Responses to Defendant Castle Hill Studio LLC's First Set of Interrogatories.

3. Attached as **Exhibit 2** is a true and correct copy of the 7th Cir. Civ. Jury Instr. 13.1.2.3 (2017).

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill  
Robert C. Gill

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of October, 2018, I caused a copy of the foregoing Declaration to be served on the following counsel via the Court's ECF system:

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